

1 **PELUSO LAW GROUP, PC**

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6 *Attorneys for 22 Camp Fire victims*
7 *and class action claimants*

8 **UNITED STATES BANKRUPTCY COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10
11 In re

Bankruptcy Case No. 19:30088 (DM)

12 **PG&E Corporation,**

Chapter 11
(Lead Case)

13 -and-

14
15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY**

NOTICE OF APPEAL AND
STATEMENT OF ELECTION TO
HAVE APPEAL HEARD BY THE
DISTRICT COURT

17 Debtors.

18 Affects both Debtors.
19
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21

22 **NOTICE IS HEREBY GIVEN** that victims of the Camp Fire represented
23 by this law firm in the above-referenced bankruptcy case (“Appellants”) hereby
24 appeal from the *Order Confirming Debtors’ and Shareholder Proponents’ Joint*
25 *Chapter 11 Plan of Reorganization Dated June 19, 2020* [Bankr. Dkt. No. 8053],
26 entered on June 20, 2020 and effective on July 1, 2020 (the “**Confirmation**
27 **Order**”), which incorporates the Fire Victim Trust Agreement and exhibits,
28

1 including the Fire Victim Claims Resolution Procedures, as filed with the Court
2 on June 21, 2020 [Bankr. Dkt. No. 8057].

3 The Confirmation Order is a final order of the Bankruptcy Court. A copy
4 of the Confirmation Order is attached hereto as Exhibit A. A copy of the Fire
5 Victim Trust Agreement and all exhibits is attached hereto as Exhibit B.

6 This appeal is directed to the Ninth Circuit Court of Appeals, as provided
7 by 28 U.S.C. § 158(d)(2); F.R.A.P. 5; and 28 U.S.C. § 158(d)(2)(A). In a separate
8 filing, Appellants will request the Bankruptcy Court to approve and certify this
9 direct appeal and provide notice to the Bankruptcy Court of Appellants petition
10 filed with the circuit clerk.

11 The central issue of the appeal involves a question of law to which
12 there is no binding precedent. For this reason, review by a bankruptcy
13 appellate panel or district court would waste precious time and resources, and
14 only delay the inevitable decision on an issue of first-impression. Thus, direct
15 appeal materially advances the progress of the case. In addition, several
16 questions of law to be presented, as well as mixed questions of fact and law,
17 involve matters of great public importance.

18 Counsel for the Debtors, the Tort Claimants Committee, the pre-petition
19 shareholders, and the Fire Victim Trustee all participated in the confirmation
20 hearing. In an abundance of caution, the Reorganized Debtors are also listed as
21 Appellees. Those parties and the names, addresses and telephone numbers of
22 their respective attorneys are:

23 **Party: Reorganized Debtors**

24 Counsel: Weil Gotshal & Manger LLP, Stephen Karotkin, et al., 767 Fifth
25 Avenue, New York, NY 10153. Tel: (212) 310-8000.

26 Counsel: Keller & Benvenuti LLP, Tobias Keller, et al., 650 California Street,
27 Suite 1900, San Francisco, CA 94108. Tel: (415) 496-6723.

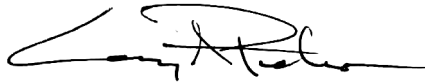
Party: Fire Victim Trust

Counsel: Brown Rudnick LLP, Joel S. Miliband, 2211 Michelson Drive, Seventh Floor, Irvine CA 92612. Tel: (949) 752-7100.

Party: Official Committee of Tort Claimants

Counsel: Baker Hostetler LLP, Robert A. Julian, 1100 Battery Street, Suite 100, San Francisco, CA 94111. Tel: (628) 208-6434.

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By: _____

Larry A. Peluso
Attorney for Camp Fire victim Appellants